



May 28, 1997

Mr. David S. Guzy
Chief, Rules and Procedures Staff
Minerals Management Service
Royalty Management Program
Building 85
Denver Federal Center
Denver, CO 80225

Re: Notice of Proposed Rulemaking, 62 Fed. Reg. 3742 (January 24, 1997)

Dear Mr. Guzy:

The Independent Petroleum Association of America ("IPAA") has reviewed the comments submitted by the Barents Group, LLC on Wednesday, May 28, 1997. IPAA would like to incorporate by reference these comments into the IPAA comments previously filed on Thursday, May 15, 1997. Thank you.

Sincerely,

A handwritten signature in cursive script that reads "Denise A. Bode".

Denise Bode
President